UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

In The Matter Of:)
Ronald Farmer) Case Number 18-44936-659)
Debtor,) Chapter 13
) Objection to Confirmation filed by U.S.
U.S. Bank National Association) Bank National Association
Creditor,))
)

OBJECTION TO CONFIRMATION

Comes now U.S. Bank National Association by its attorney and for its objection to confirmation states as follows:

- 1. U.S. Bank National Association is the holder of a Deed of Trust and Note secured by real property located at 312 Utz Lane, Hazelwood, MO 63042. Said property is listed by the Debtor as an asset of the bankruptcy estate.
- 2. The approximate prepetition arrearages owed to U.S. Bank National Association are \$18,159.08. The approximate total pay off due to U.S. Bank National Association under the note is \$111,995.45.
- 3. The Chapter 13 Plan filed by the Debtor fails to provide for the treatment of the on-going mortgage payments to Creditor. Further, the Debtor's plan lists arrearages as \$12,000.00. The current pre-petition arrearage owed is \$18,159.08.

WHEREFORE, U.S. Bank National Association prays confirmation of the plan filed by the Debtor be denied, that this case be dismissed for failure to propose a confirmable plan; and for such further orders as the Court deems just and proper.

Dated August 29, 2018

Respectfully Submitted, Millsap & Singer, LLC

/s/ William T. Holmes, II

Cynthia M. Kern Woolverton, #47698, #47698MO William T. Holmes, II, #59759, #59759MO Stewart C. Bogart, #67956, #67956MO 612 Spirit Drive St. Louis, MO 63005

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on August 29, 2018, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court pursuant to CM/ECF as set out on the Notice of Electronic filing as issued by the Court or in the alternative has been served by depositing a true and correct copy of same enclosed in a postage prepaid, properly addressed envelope, in a post office official depository under the exclusive care and custody of the United States Postal Service within the state of Missouri on those parties directed by the Court on the Notice of Electronic Filing issued by the Court as required by the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court.

/s/ William T. Holmes, II

Electronic Mail Notice List

The following is the list of attorneys who are currently on the list to receive e-mail notices for this case.

Timothy Patrick Powderly

Diana S. Daugherty

Office of the United States Trustee

Manual Notice List

The following is a list of parties who are not on the list to receive e-mail notices for this case (who therefore require manual noticing).

Ronald Farmer 312 Utz Lane Hazelwood, MO 63042

